

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

DOCKET NO: 05-CR-10220-NMG

\_\_\_\_\_  
UNITED STATES OF AMERICA )  
 )  
vs. )  
 )  
JAMES GOODWYN )  
 )  
\_\_\_\_\_ )

MOTION TO EXTEND THE TIME FOR FILING OBJECTIONS  
TO THE PRE-PLEA PRESENTENCE REPORT

The defendant in the above entitled matter, James Goodwyn, moves this court to extend the time for filing written objections to the Pre-Plea Presentence Report until September 5, 2006, and assigns as reasons therefor the following:

1. The defendant has not yet pled guilty. The Rule 11 hearing is not scheduled for hearing until October 6, 2006.
2. The defendant and counsel have not had an adequate opportunity to carefully review the report together.
3. The requested continuance will not in any way further delay the plea or sentencing.

Wherefore, for the above reasons, the defendant requests the court extend the time for filing the objections.

By his attorney,

/s/ Joseph F. Krowski Jr.  
JOSEPH F. KROWSKI JR.  
30 Cottage Street  
Brockton, MA. 02301  
508-584-2555

Dated: August 10, 2006

